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February 5, 2021

## VIA ECF

Hon. John G. Koeltl  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

The conference is canceled. All other  
dates extended as requested.

SO ORDERED

February 8, 2021	<u>/s/ John G. Koeltl</u>
New York, NY	John G. Koeltl
	U.S.D.J.

**Re:** *Zheng v. LiveAuctioneers LLC*, 1:20-cv-9744-JGK

Dear Judge Koeltl,

Plaintiff Peiran Zheng and Defendant LiveAuctioneers, LLC jointly submit this letter regarding deadlines in the above-referenced matter. Plaintiff requests an extension of time of 14 days from the current deadline of February 12, 2021 to February 26, 2021, for Plaintiff to file his response to Defendant LiveAuctioneers LLC's Motion to Compel Arbitration and Stay This Action (Doc. #18). Plaintiff has consulted with counsel for Defendant. Defendant does not oppose the requested extension, and requests that it be granted one additional week to file its reply brief (which would extend the deadline, assuming Plaintiff's request is granted, from March 5, 2021 to March 12, 2021). This is Plaintiff's and Defendant's first request for an extension of time with respect to these deadlines.

In addition, the parties jointly request that the Court postpone the Pretrial Conference, currently set for March 8, 2021, by 60 days. Given the pending motion to compel arbitration, the parties believe it would be more efficient for the Court to defer the Pretrial Conference (and the related obligations of the parties to propose a schedule and address the other matters required by Fed. R. Civ. P. 26) until after the Court rules on Defendant's motion to compel arbitration. This is the first request of the parties to postpone this conference.

Finally, for the same reason (in light of the motion to compel arbitration), Defendant requests an additional 60 days to answer or otherwise respond to the complaint, which would extend the current deadline of March 5, 2021 to May 4, 2021. Plaintiff consents to this request, subject to the Court's approval. This is the second request for an extension with respect to this deadline. The original deadline of February 2, 2021 was extended by the Court to March 5, 2021, following Defendant's prior request (Doc. #16).

Accordingly, the parties (as explained above) respectfully request that the Court extend the following deadlines in this matter:

<b><u>Event</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed New Deadline</u></b>
Opposition to Motion to Compel Arbitration	February 12, 2021	February 26, 2021
Reply in Support of Motion to Compel Arbitration	March 5, 2021	March 12, 2021
Deadline to Answer or Respond to the Complaint	March 5, 2021	May 4, 2021
Pretrial Conference	March 8, 2021	May 7, 2021 or such other date that is convenient for the Court

Respectfully submitted,

/s/ Thomas A. Zimmerman, Jr.

Thomas A. Zimmerman, Jr.  
(admitted *pro hac vice*)

Counsel for Plaintiff

/s/ David S. Douglas

David S. Douglas

Counsel for Defendant

cc: Counsel of record (Via ECF)